



January 7, 2021

Honorable Steven L. Tiscione
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Francisco Suriel v. The Port Authority of New York and New Jersey, et al.
Docket No.: 19-cv-3867


Dear Judge Tiscione:

The Port Authority of New York and New Jersey (the Port Authority) and the individual police officer defendants, Andrew Samuel, Joseph Opromalla, Jeremy Kahn and Brett Telesford, respectfully request that this Court “so order” the two attached subpoenas to the New York City Police Department and one attached subpoena to Jamaica Hospital so that we may proceed with depositions. At the conference on December 17, 2020, your Honor stated that we could submit these subpoenas if it was required for the deposition of the New York City Police Department individual who assessed Plaintiff’s condition upon his transfer to their custody and any corresponding records of this. In addition, Jamaica Hospital has advised it needs a “so ordered” subpoena to accept service for Defendants to depose the Jamaica Hospital EMT who treated Plaintiff on the date of incident while in Port Authority Police custody, since Plaintiff objects to completing Section 9(b) in the HIPAA authorization that is otherwise required by the hospital.

I called Chambers on December 23, 2020 as to the best method of submitting these subpoenas, but I did not receive a response how to proceed, so I am taking the liberty of filing them ECF in order to avoid delaying the depositions. I will resubmit these subpoenas in a different manner if the Court so directs.

Respectfully submitted,

PORT AUTHORITY LAW DEPARTMENT
Attorneys for Defendants

By: 

Christopher Valletta, Esq.
Kathleen Gill Miller, Esq.

Cc: Gabriel Harvis, Esq. (*via e-filing*)